

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY et al.,

Defendants.

CASE NO. 7:20-CV-00947-DCC

**DEFENDANT MG FREESITES AND
MINDGEEK S.A.R.L.'S MOTION TO
COMPEL INDEPENDENT MENTAL
EXAMINATIONS (FED. R. CIV. P. 35)**

Pursuant to Rule 35 of the Federal Rules of Civil Procedure, defendant MG Freesites Ltd. and Mindgeek S.à r.l. (together, “Defendants”), by and through their undersigned counsel, hereby move the Court to compel certain Plaintiffs—namely, Does 2, 4, 5, 6, 7, and 9—to appear for an independent mental examination by Dr. Janine Shelby, Ph.D, in accordance with the reasonable parameters set forth in the accompanying Proposed Order. In support of their Motion, Defendants submit the accompanying Memorandum of Law, Declaration of Dr. Janine Shelby, Ph.D. with supporting Exhibit A, and Declaration of Marc E. Mayer, Esq. with supporting Exhibits A-N. Pursuant to Local Rule 7.02 of the U.S. District Court for the District of South Carolina, prior to filing this Motion, counsel for Defendants conferred with Plaintiffs’ counsel and attempted in good faith to resolve the matter set forth in this Motion to no avail.

DATED: May 30, 2024

Columbia, South Carolina

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By: /s/ Mark Goddard

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